

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

Re: ECF No. 20467

**URGENT CONSENTED MOTION FOR EXTENSION OF DEADLINE TO FILE
VERIFIED STATEMENT OF MARINI PIETRANTONI MUÑIZ, LLC DISCLOSING
CONNECTIONS TO MATERIAL INTERESTED PARTIES PURSUANT TO
PUERTO RICO RECOVERY ACCURACY IN DISCLOSURE ACT**

To the Honorable United States District Judge Laura Taylor Swain:

COME NOW, Marini Pietrantoni Muñoz, LLC (“MPM”), local counsel to the Puerto Rico Fiscal Agency and Financial Advisory Authority (“AAFAF”), and hereby respectfully submits this urgent consented motion (the “Urgent Motion”) for entry of an order, substantially in the form attached hereto as **Exhibit A** (the “Proposed Order”), extending the deadlines set forth in the *Order Approving List of Material Interested Parties Pursuant to the Puerto Rico Recovery Accuracy in Disclosures Act Briefing of Urgent Motion for Relief from Stay* [ECF No. 20467] (the “Order”).

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

1. On January 20, 2022, Public Law No. 117-82 the *Puerto Rico Recovery Accuracy in Disclosures Act* (“PRRADA”) was enacted establishing “new disclosure requirements for professional persons seeking compensation pursuant to sections 316 and 317 of the *Puerto Rico Oversight, Management, and Economic Stability Act* (“PROMESA”).” [ECF No. 19859].

2. On February 22, 2022, the Puerto Rico Financial Oversight and Management Board (“FOMB”) filed a proposed List Of Material Interested Parties pursuant to PRRADA. [ECF No. 20194].

3. On March 28, 2022, the FOMB filed an amended List Of Material Interested Parties. [ECF No. 20455]

4. On March 30, 2022, this Court entered the Order establishing May 16, 2022, as the deadline for all Title III professionals to file the required disclosures pursuant to PRRADA. [ECF No. 20467]

5. Since then, MPM has been working diligently to gather the necessary information in order to properly comply with the new disclosure requirements established by PRRADA. However, MPM requires additional time to gather information and prepare the required PRRADA disclosures in order to adequately comply with said requirements as established by both Congress and this Court. MPM has reached out to the U.S. Trustee’s counsel, who have consented to a ten-day extension, for MPM to submit its verified statement with the required PRRADA disclosures.

6. Thus, MPM respectfully requests, with the U.S. Trustee’s consent, that the Court grants it a ten-day extension, until May 26, 2022, to submit its verified statement with the required PRRADA disclosures.

7. Pursuant to Paragraph I.H of the *Fifteenth Amended Notice, Case Management and Administrative Procedures* [ECF No. 17127-1] (the “Case Management Procedures”), MPM hereby certifies that it has carefully examined the matter and concluded that there is a true need

for an urgent motion; it has not created the urgency through any lack of due diligence; has made a bona fide effort to resolve the matter without a hearing; has made reasonable, good-faith communications in an effort to resolve or narrow the issues that are being brought to the Court, and no party opposes the relief requested herein.

WHEREFORE, MPM respectfully requests that this Court enter the Proposed Order and grant such other relief as is just and proper.

Dated: May 16, 2022
San Juan, Puerto Rico

Respectfully submitted,

/s/ Luis C. Marini
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EXHIBIT A – PROPOSED ORDER